

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SUSAN FLANNIGAN,

Plaintiff,

v.

VULCAN POWER GROUP, L.L.C.,
AJAX CAPITAL L.L.C.,
FORD F. GRAHAM, KEVIN C. DAVIS,
and VULCAN CAPITAL., L.L.C.,

Defendants.

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: Docket No. 09 Civ. 8473
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**MOTION TO AMEND STIPULATION AND ORDER TO
ALLOW DEFENDANT TO RESIDE IN VIRGINIA**

PLEASE TAKE NOTICE that, David M. Taus, Esq. and Christopher G. Olsen Esq. (*Admitted Pro Hac Vice*) both of the firm of Schwartz, Hanna, Olsen & Taus, hereby moves this Court for an Order amended the Stipulation and Order dated January 24, 2020 to allow Defendant Ford Graham to reside in Virginia and not be required to live within 100 miles of the South District of New York.

PLEASE TAKE FURTHER NOTICE that movant shall rely upon the certifications of David M. Taus and Christopher G. Olsen in support of this application. A proposed form of Order is submitted herewith.

Dated: April 14, 2021

Schwartz, Hanna, Olsen & Taus, PC
Attorneys for Defendant, Ford F. Graham

By: /s/ David M. Taus .

Schwartz, Hanna, Olsen & Taus, PC
Attorneys for Defendant, Ford F. Graham

By: /s/Christopher Olsen (Pro Hac Vice)

CERTIFICATE OF SERVICE

I, David M. Taus and Christopher Olsen, certify that on April 14, 2021, I caused the foregoing Motion to amended the Stipulation and Order dated January 24, 2020 to allow Defendant Ford Graham to reside in Virginia and not be required to live within 100 miles of the South District of New York and accompanying Certifications of David M. Taus, Esq. and Christopher G. Olsen, Esq. and Proposed Order to be filed with the Clerk of the Court and served upon all counsel of record via the Court's CM/ECF system.

Schwartz, Hanna, Olsen & Taus, PC
Attorneys for Defendant, Ford F. Graham

By: /s/ David M. Taus .

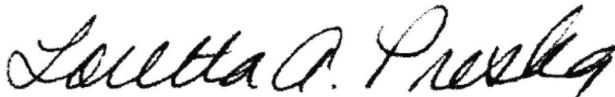
Schwartz, Hanna, Olsen & Taus, PC
Attorneys for Defendant, Ford F. Graham

By: /s/Christopher Olsen (Pro Hac Vice)

Ms. Flannigan shall inform the Court of her views on Mr. Graham's motion to amend the stipulation, (dkt. no. 338), no later than April 23, 2021.

SO ORDERED.

Dated: April 15, 2021
New York, New York



LORETTA A. PRESKA, U.S.D.J.